

## Brigham Young University Law School BYU Law Digital Commons

---

### Utah Supreme Court Briefs

---

2003

# Tyler Hansen and the Workers Compensation Fund of Utah v. Amanda S. Eyre and the Nature Conservancy : Brief of Respondent

Utah Supreme Court

Follow this and additional works at: [https://digitalcommons.law.byu.edu/byu\\_sc2](https://digitalcommons.law.byu.edu/byu_sc2)

 Part of the [Law Commons](#)

Original Brief Submitted to the Utah Supreme Court; digitized by the Howard W. Hunter Law Library, J. Reuben Clark Law School, Brigham Young University, Provo, Utah; machine-generated OCR, may contain errors.

Edward T. Wells; Mel S. Martin; Attorneys for Petitioners.

Lloyd R. Jones; Peterson & Associates; Attorney for Respondent Michael K Woolley; Robert L. Janicki; Strong & Hanni; Attorney for Respondent The Nature Conservancy.

---

### Recommended Citation

Brief of Respondent, *Hansen v. Nature and the Conservancy*, No. 20030731.00 (Utah Supreme Court, 2003).  
[https://digitalcommons.law.byu.edu/byu\\_sc2/2458](https://digitalcommons.law.byu.edu/byu_sc2/2458)

This Brief of Respondent is brought to you for free and open access by BYU Law Digital Commons. It has been accepted for inclusion in Utah Supreme Court Briefs by an authorized administrator of BYU Law Digital Commons. Policies regarding these Utah briefs are available at [http://digitalcommons.law.byu.edu/utah\\_court\\_briefs/policies.html](http://digitalcommons.law.byu.edu/utah_court_briefs/policies.html). Please contact the Repository Manager at [hunterlawlibrary@byu.edu](mailto:hunterlawlibrary@byu.edu) with questions or feedback.

TYLER HANSEN and THE  
WORKERS COMPENSATION  
FUND OF UTAH,

Plaintiffs and Petitioners,

VS.

AMANDA S. EYRE and THE  
NATURE CONSERVANCY,

## Defendants and Respondents,

**BRIEF OF RESPONDENT  
AMANDA S. EYRE IN  
OPPOSITION TO PLAINTIFF  
TYLER HANSEN'S PETITION  
FOR CERTIORARI**

Supreme Court  
Case No.:20030731-SC

2

## RESPONDENT AMANDA S. EYRE'S BRIEF

Lloyd R. Jones (#6757)  
PETERSEN & ASSOCIATES  
230 South 500 East,  
Suite 400  
Salt Lake City, UT 84102  
Telephone: 801-328-5555  
*Attorneys for Defendant and  
Respondent Amanda S. Eyre*

Mel S. Martin (#2102)  
Edward T. Wells (#3422)  
5282 South Commerce Drive, #D-292  
Murray, Utah 84107  
Telephone: 801-263-1493  
*Attorneys for Plaintiffs/Petitioner  
Tyler Hansen and The Workers  
Compensation Fund of Utah*

Robert L. Janicki (#5493)  
Michael K. Woolley (#8567)  
Strong & Hanni  
3 Triad Center, Suite 500  
Salt Lake City, Utah 84111  
Telephone: 801-532-7080  
*Attorneys for Defendant/Respondent*  
*The Nature Conservancy*

FILED  
UTAH APPELLATE COURTS

MAY 12 2004

TYLER HANSEN and THE  
WORKERS COMPENSATION  
FUND OF UTAH,

vs.

## Defendants and Respondents,

Supreme Court  
Case No.:20030731-SC

Lloyd R. Jones (#6757)  
PETERSEN & ASSOCIATES  
230 South 500 East,  
Suite 400  
Salt Lake City, UT 84102  
Telephone: 801-328-5555  
*Attorneys for Defendant and  
Respondent Amanda S. Eyre*

Mel S. Martin (#2102)  
Edward T. Wells (#3422)  
5282 South Commerce Drive, #D-292  
Murray, Utah 84107  
Telephone: 801-263-1493  
*Attorneys for Plaintiffs/Petitioner  
Tyler Hansen and The Workers  
Compensation Fund of Utah*

Robert L. Janicki (#5493)  
Michael K. Woolley (#8567)  
Strong & Hanni  
3 Triad Center, Suite 500  
Salt Lake City, Utah 84111  
Telephone: 801-532-7080  
*Attorneys for Defendant/Respondent*  
*The Nature Conservancy*

## TABLE OF CONTENTS

Jurisdictional Statement . . . . .	1
Statement of the Case . . . . .	1
Statement of Issues for Review on Certiorari . . . . .	1
Standard of Review . . . . .	1
Statement of the Case . . . . .	1
Summary of the Argument . . . . .	1
Conclusion . . . . .	2

## **JURISDICTIONAL STATEMENT**

Amanda Eyre joins the Nature Conservancy in the jurisdictional statement.

## **STATEMENT OF ISSUES FOR REVIEW ON CERTIORARI**

Amanda Eyre joins the Nature Conservancy in the statement of issues for review on certiorari in the case.

## **STANDARD OF REVIEW**

Amanda Eyre joins the Nature Conservancy in the standard of review of the case.

## **STATEMENT OF THE CASE**

Amanda Eyre joins the Nature Conservancy in the statement of the case.

## **SUMMARY OF THE ARGUMENT**

Amanda Eyre joins the Nature Conservancy in the summary of the argument of the case.

## **ARGUMENT**

Amanda Eyre joins the Nature Conservancy in the argument of the case.

## CONCLUSION

Amanda Eyre joins the Nature Conservancy in the conclusion of the case.

Dated this 12<sup>th</sup> day of May, 2004.

PETERSEN & ASSOCIATES

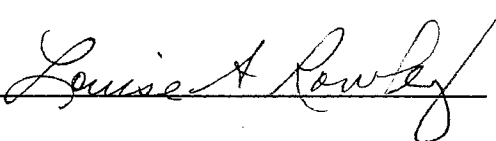
By: Lloyd R. Jones  
Lloyd R. Jones  
Attorneys for Respondent  
Amanda S. Eyre

### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing BRIEF OF  
RESPONDENT AMANDA S. EYRE was mailed, postage prepaid, on May 12,  
2004 to the following:

Mel S. Martin  
Edward T. Wells  
5282 South Commerce Drive, #D-292  
Murray, Utah 84107

Michael K. Woolley  
Robert L. Janicki  
Strong & Hanni  
3 Trial Center  
Suite 500  
Salt Lake City, Utah 84180

  
\_\_\_\_\_